



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 9, 2004

RQ-2

Ms. Melinda Hatton, Treasurer  
American Hospital Association PAC  
325 Seventh Street NW, Suite 700  
Washington, DC 20004

Response Due Date:  
July 9, 2004

Identification Number: C00106146

Reference: April Monthly Report (3/1/04-3/31/04) and May Monthly Report (4/1/04-4/30/04)

Dear Ms. Hatton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Schedule B supporting Line 21(b) discloses negative entries for apparent in-kind contributions disclosed on Schedule B supporting Line 23 of your committee's report on behalf of federal candidate(s). Please be advised that in-kind contributions should be disclosed on Schedule B supporting Line 23 according to the date the goods/services are provided to the candidate. This method of reporting would clarify for the public record the total amount of contributions to federal candidates, including in-kind contributions. Any subsequent payment(s) to a vendor(s) for the in-kind goods/services should be disclosed as a memo entry(s) on Schedule B supporting Line 21(b), during the appropriate reporting period, according to the date the payment was made. Please amend your report to clarify this discrepancy. Please refer to the enclosed sample of properly reported in-kind contributions.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee.

Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Kristen Davis  
Campaign Finance Analyst  
Reports Analysis Division

## 4. Itemized Disbursements: Schedule B

### When to Itemize Disbursements

#### Regardless of Amount

Several types of disbursements must be itemized regardless of amount:

- Transfers to affiliated SSFs;
- Contributions to candidates and political committees;
- Loan repayments; and
- Loans made by the SSF.

Note that refunds of contributions (Line 28 on the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained earlier in this chapter.

#### Other Disbursements: \$200 Threshold

A disbursement that does not fall under one of the categories listed above (such as a donation to a nonfederal candidate) must be itemized if it exceeds \$200 when aggregated with other disbursements made to the same payee during the calendar year.

### How to Itemize Disbursements

#### Categorizing Disbursements

Before beginning to itemize the committee's disbursements, separate them into the different categories listed on the Detailed Summary Page ("Operating Expenditures," "Contributions to Federal Candidates," etc.; an illustration of a completed Detailed Summary Page appears on pages 54-55). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by checking the appropriate box for the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

## IN-KIND CONTRIBUTIONS TO CANDIDATES

Disclosure of In-Kind Contribution Made

| SCHEDULE B (FEC Form 8X)<br>ITEMIZED DISBURSEMENTS  |  | Use separate schedule(s) for each category of the Detailed Summary Page   | Each line number (attach copy only) | 1 PAGE   | OF |
|---|--|---|-------------------------------------|--|----|
| Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of the person entitled to such contributions for such purposes. |  | <input type="checkbox"/> 101 <input type="checkbox"/> 102 <input type="checkbox"/> 103 <input type="checkbox"/> 104 <input type="checkbox"/> 105 <input type="checkbox"/> 106 <input type="checkbox"/> 107 <input type="checkbox"/> 108 <input type="checkbox"/> 109 <input type="checkbox"/> 110 |                                     |  |    |
| NAME OF COMMITTEE (in Full)   |  |   |                                     |  |    |
| Critical Response Inc. PAC  |  |   |                                     |  |    |
| Full Name (Last, First, Middle Initial)   |  |   |                                     |  |    |
| 1. Grand Plaza Hotel  |  | Date of Disbursement  |                                     | 08/08/00   |    |
| MAILING ADDRESS   |  | City  |                                     | State  |    |
| 19 Ordanville Street  |  | Alexandria  |                                     | VA   |    |
| Zip Code  |  | 00000   |                                     |  |    |
| Purpose of Disbursement   |  | Category Code   |                                     | G13  |    |
| Reception   |  | Candidate Name  |                                     | Bart J. Stiles   |    |
| Office Budget   |  | Disbursement For  |                                     | <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) _____ |    |
| <input checked="" type="checkbox"/> House<br><input type="checkbox"/> Senate<br><input type="checkbox"/> President<br><input type="checkbox"/> Other (specify) _____  |  | Amount of Each Disbursement per Form  |                                     | (\$72.40)  |    |
| Total: 100  |  | Amount: 00  |                                     |  |    |

Additional Reporting of Payment to Vendor -  
If Made After Goods/Services Provided.

| SCHEDULE B (FEC Form 8X)<br>ITEMIZED DISBURSEMENTS  |  | Use separate schedule(s) for each category of the Detailed Summary Page   | Each line number (attach copy only) | 2 PAGE   | OF |
|---|--|---|-------------------------------------|--|----|
| Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of the person entitled to such contributions for such purposes. |  | <input type="checkbox"/> 101 <input type="checkbox"/> 102 <input type="checkbox"/> 103 <input type="checkbox"/> 104 <input type="checkbox"/> 105 <input type="checkbox"/> 106 <input type="checkbox"/> 107 <input type="checkbox"/> 108 <input type="checkbox"/> 109 <input type="checkbox"/> 110 |                                     |  |    |
| NAME OF COMMITTEE (in Full)   |  |   |                                     |  |    |
| Critical Response Inc. PAC  |  |   |                                     |  |    |
| Full Name (Last, First, Middle Initial)   |  |   |                                     |  |    |
| 2. Grand Plaza Hotel  |  | Date of Disbursement  |                                     | 08/08/00   |    |
| MAILING ADDRESS   |  | City  |                                     | State  |    |
| 19 Ordanville Street  |  | Alexandria  |                                     | VA   |    |
| Zip Code  |  | 00000   |                                     |  |    |
| Purpose of Disbursement   |  | Category Code   |                                     | G13  |    |
| Reception   |  | Candidate Name  |                                     | Bart J. Stiles   |    |
| Office Budget   |  | Disbursement For  |                                     | <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) _____ |    |
| <input checked="" type="checkbox"/> House<br><input type="checkbox"/> Senate<br><input type="checkbox"/> President<br><input type="checkbox"/> Other (specify) _____  |  | Amount of Each Disbursement per Form  |                                     | (\$72.40)  |    |
| Total: 100  |  | Amount: 00  |                                     |  |    |

\*When using Verifone, "MEMO" is entered automatically by checking the memo dialing box.

\*Using 8249 file, enter information here using "to the lead" dial. See page 415.

#### Itemized Information

Itemized disbursement information includes:

- Name of payee;
  - Address of payee;
  - Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B instructions and 104.3(b)(3)(i)(B));
  - Category Code (see Instructions for Schedules B and E);
  - Date of payment; and
  - Amount.
- 104.3(b)(3); 104.9.

#### Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box, 104.3(b)(3)(v). See adjacent illustrations.